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11 Attorneys for Defendant  
FLUIDMASTER, INC.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION – SANTA ANA

16  
17 AMERICAN SELECT  
18 INSURANCE COMPANY, THE  
19 CINCINNATI INSURANCE  
20 COMPANY, ERIE INSURANCE  
21 COMPANY, ERIE INSURANCE  
22 EXCHANGE, ERIE INSURANCE  
23 PROPERTY & CASUALTY  
24 COMPANY, THE FIRST LIBERTY  
25 INSURANCE CORPORATION,  
26 FIRST NATIONAL INSURANCE  
27 COMPANY OF AMERICA,  
28 HARLEYSVILLE PREFERRED  
INSURANCE COMPANY,  
LIBERTY INSURANCE  
CORPORATION, LIBERTY  
MUTUAL FIRE INSURANCE  
COMPANY, LIBERTY MUTUAL  
INSURANCE COMPANY, LM  
INSURANCE CORPORATION,  
PEERLESS INSURANCE  
COMPANY, SAFECO  
INSURANCE COMPANY OF  
AMERICA, SAFECO INSURANCE

Case No. 8:15-cv-00073-JVS-JCG

[Central District Local Rule 83-1.3]

Judge: Hon. James V. Selna

Magistrate Judge: Hon. Jay C. Gandhi

Date Action Filed: January 15, 2015

Trial Date: None set

1 COMPANY OF ILLINOIS,  
2 SAFECO INSURANCE COMPANY  
3 OF INDIANA, UNIVERSAL  
4 PROPERTY & CASUALTY  
5 INSURANCE COMPANY,  
6 WESTFIELD INSURANCE  
7 COMPANY, and WESTFIELD  
8 NATIONAL INSURANCE  
9 COMPANY, a/s/o INSUREDS, as  
listed on "Schedule A" and  
"Schedule B",  
Plaintiffs  
vs.  
FLUIDMASTER, INC.,  
Defendant.

11 Pursuant to Central District Local Rule 83-1.3, Defendant Fluidmaster,  
12 Inc. (“Fluidmaster”) hereby provides notice of a related case “filed in this  
13 District.” C. D. L. R. 83-1.3.1.

14        Rensel, et al. v. Fluidmaster, Inc., No. 8:14-cv-00648 (C.D. Cal.) was  
15        filed in this District on April 24, 2014 and assigned to the Honorable Judge  
16        Percy Anderson. Plaintiffs' central allegation in the Rensel action is whether  
17        Fluidmaster's toilet connectors with acetal coupling nuts are defective. On  
18        November 12, 2014, Judge Anderson sanctioned Plaintiffs' attorneys, struck  
19        their class allegations, and denied Plaintiffs' Motion for Class Certification as  
20        moot. Rensel Docket No. 97. Moreover, on December 11, 2014, pursuant to  
21        28 U.S.C. § 1407, the United States Judicial Panel on Multidistrict Litigation  
22        ("Panel") ordered that the Rensel action be transferred, along with two other  
23        actions, to the Northern District of Illinois and assigned to the Honorable  
24        Robert M. Dow, Jr. for coordinated or consolidated pretrial proceedings with  
25        another action already pending there. See In Re Fluidmaster, Inc., Water

1 Connector Components Products Liability Litigation, MDL No. 2575 (N.D.  
 2 Ill.).<sup>1</sup>

3 In this action, Plaintiffs seek to recover damages allegedly caused by  
 4 defects associated with Fluidmaster's "NO-BURST" Water Supply Lines  
 5 ("NO-BURST Lines"). FAC at ¶ 1. Plaintiffs assert that they are insurers  
 6 who have made payments on behalf of their insureds for the damages. Id. at ¶  
 7 4. Plaintiffs allege that the NO-BURST Lines routinely rupture and burst  
 8 because Fluidmaster used an inferior grade of stainless steel and that  
 9 Fluidmaster used inadequate low-pressure flexible rubber tubing. FAC at ¶  
 10 35. Plaintiffs further allege that "the NO-BURST Lines routinely fail because  
 11 their plastic coupling nuts made of acetal crack and/or fracture during their  
 12 ordinary and intended use..." Id. at ¶ 36.

13 Since Plaintiffs in this case also allege that the toilet connectors with  
 14 acetal coupling nuts are defective, both this case and the Rensel case "call for  
 15 a determination of the same or substantially related or similar questions of law  
 16 and fact." C.D.L.R. 83-1.3.1(b). Additionally, the two cases also "arise from  
 17 the same or a closely related transaction, happening, or event." C.D.L.R. 83-  
 18 1.3.1(a).

19 For these reasons, Fluidmaster requests that these cases be related.  
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27 <sup>1</sup> On January 23, 2015, Fluidmaster filed a Notice of Potential Tag-Along  
 28 Action with the Judicial Panel on Multidistrict Litigation, which stated that  
 the current action is a potential tag-along action in MDL No. 2575.

1 Dated: January 26, 2015.

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7 By /s/ Sarkis A. Khachatryan

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10 Attorneys for Defendant  
11 Fluidmaster, Inc.